UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

CLINGMAN & HANGER	§	
MANAGEMENT ASSOCIATES,	§	
LLC, AS TRUSTEE OF THE FURIE	§	
LITIGATION TRUST,	§	Civil Action No. 4:21-cv-02698
	§	
Plaintiff,	§	Judge Charles Eskridge
	§	
V.	§	
	§	
KAY RIECK, ET AL.,	§	
	§	
Defendants.	§	

DEFENDANT MICHAEL ANTHONY NUNES' INITIAL DISCLOSURES

Pursuant to Fed.R.Civ.P. 26(A)(1), Tony Nunes makes the following initial disclosures:

(i) <u>Individuals likely to have discoverable information:</u>

Nunes adopts the list of individuals in the Plaintiff's initial disclosures and will supplement in the event additional names become known.

(ii) Documents:

Nunes has possession of certain emails relating to his representation of Furie and its related parties. In accordance with the Court's Standard E-Discovery Order, his emails will be handled through specific production requests.

(iii) Damages:

Nunes does not presently claim damages from the Plaintiff.

(iv) <u>Insurance</u>:

Nunes will produce any required insuring agreements at an appropriate time in the event Plaintiff's claims against him are not dismissed.

Respectfully submitted,

Murray Fogler
Murray Fogler
State Bar No. 07207300
S.D. Tex. Bar No. 2003
mfogler@foglerbrar.com
Fogler, Brar, O'Neil & Gray LLP
2 Houston Center
909 Fannin, Suite 1640
Houston, Texas 77010
Telephone No. (713) 481-1010
Facsimile No. (713) 574-3224

Attorney for Defendant Michael Anthony Nunes

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument was served upon all counsel of record on October 21, 2021, using the Court's electronic filing system.

Murray Fogler	
Murray Fogler	